



4210 East 11th Avenue
Denver, Colorado 80220-3716
Phone (303) 320-8333

Telefax Numbers:
Main Building/Denver
(303) 322-9076

Ptarmigan Place/Denver
(303) 320-1529

First National Bank Building/Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

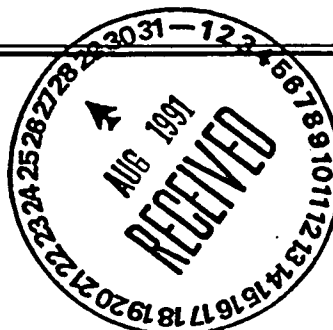
Pueblo Office
(719) 543-8441

ROY ROMER
Governor

JOEL KOHN
Interim Executive Director

August 19, 1991

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928



RE: Phase II RFI/RI Workplan (Bedrock), Draft Final, June, 1991

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), and the Environmental Protection Agency (EPA) have reviewed the above referenced document prepared by DOE and it's prime operating contractor EG&G. Based on our review, the Division and EPA are hereby approving this workplan.

During recent staff-level meetings, questions arose about how the workplan addresses the pre-1986 wells. The plan admits that these wells may be acting as a release mechanism for contaminants into the deeper bedrock zones. Only well 22-74, however, is being directly characterized in the workplan with the drilling of Cluster #19. The Division and EPA believe that wells 1-71, 2-71, 1-74, and 3-74 may also need adjacent boreholes so that the stratigraphy at these locations can be determined. If sands are found at or near the depths where these wells terminated, then monitoring wells should be considered as a possible contingency. Geophysical testing of the old wells, as appropriate, should also be included.

In addition, the Field Sampling Plan (FSP), Section 8.2.3, implies that if the expected sands are not present at a particular borehole location, wells planned to monitor these sands will be omitted from the program. No mention is made of the possibility of encountering new or unexpected sands and adding wells to monitor these sands. It was our understanding this would be done, but we request that an explicit commitment to do so be made.

Failure to fully address these items may weaken the data generated by this workplan and could preclude DOE from completing a Baseline Risk Assessment and/or making a corrective action decision. These decisions are the ultimate goal of the RFI/RI process, and every effort should be made to gather the data that will support them.

ADMIN RECORD

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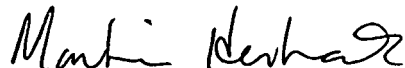
As we discussed with your staff, your response to these items can be contained in a technical memorandum, which will become an amendment to the workplan after approval by the Division and EPA. We request submittal of this technical memorandum not later than September 13, 1991, and will provide expedited review as required. However, this process need not delay implementation of the plan as approved herein.

If you have any questions regarding these matters, please call Joe Schieffelin (CDH) at 331-4421 or Bill Fraser (EPA) at 294-1081.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division



Martin Hestmark
Manager, Rocky Flats Project
US Environmental Protection Agency, Region VIII

cc: Daniel S. Miller, AGO
Brent Lewis, DOE
Tom Greengard, EG&G
Brooke Wilson, EG&G
Barbara Barry, RFPU